

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

Administration of the )  
North American Numbering Plan, ) CC Docket No. 92-237  
Carrier Identification Codes (CICs) )

**COMMENTS OF QWEST COMMUNICATIONS CORPORATION**

Qwest Communications Corporation ("QCC"), by its attorneys, hereby submits these comments in the above-referenced proceeding in response to the March 26, 1998 Public Notice of the Federal Communications Commission ("FCC") and in support of the MCI Communications Corporation ("MCI") and VarTec Telecom, Inc. ("VarTec") requests that all local exchange carriers ("LECs") be required to offer an acceptable standard intercept message adopted by the industry following the transition from three-digit to four-digit carrier identification codes ("CICs").

**BACKGROUND**

QCC is an interexchange carrier that provides multimedia communications services to interexchange carriers and other communications entities, businesses, and consumers, using its own facilities as well as facilities leased from other carriers, and is authorized by the Commission to provide international service. QCC also constructs and installs fiber optic communications systems for other communications companies, and is implementing the Qwest Network, a fiber optic network to cover in excess of 16,000 miles and connect more than 125 cities upon completion in 1999. QCC is currently, and has been since early 1997, serving dial around customers. QCC is concerned that absent

standardized LEC intercept messages, LEC recordings will be detrimental to dial around customers and will cause unwarranted confusion.

During the transition from three-digit to four-digit CICs, the Federal Communications Commission (“FCC”) directed all LECs to offer a standard intercept message to inform callers of the dialing pattern change and to instruct callers to contact their interexchange carrier (“IXC”) for further information.<sup>1</sup> The Commission further directed LECs to consult with IXCs to “reach agreement on the content of the message and on the period of time during which the message will be provided.”<sup>2</sup> Finally, the Commission stated that it would “resolve any disputes arising from parties’ inability to reach agreement” on these issues.<sup>3</sup>

Although the industry has worked in recent months to develop a standard intercept message, several developments during this process threaten to undermine the intent of the Commission’s *CIC Reconsideration Order*. First, and most importantly, it has become clear that some LECs do not intend to offer the standard intercept message. Second, some disagreement remains regarding the content of the standard intercept message. Third, IXCs are concerned that the possible LEC use of Special Information Tones (“SITs”), which are tones used in carrier switches preceding some recorded announcements, will undercut the educational effectiveness of the intercept message.<sup>4</sup>

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<sup>1</sup> *Administration of the North American Numbering Plan, Carrier Identification Codes (CICs)*, 12 FCC Rcd 17876, 17892 (1997) (“*CIC Reconsideration Order*”).

<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

<sup>4</sup> QCC has additional concerns about the CIC transition process. Specifically, QCC shares MCI’s concern that the transition period should be extended. Ex Parte Letter from Tritt to Caton of 09/16/97. Additionally, like VarTec, QCC has encountered problems

QCC supports the MCI and VarTec *ex parte* requests for Commission action to ensure the success of the CIC transition,<sup>5</sup> and urges the Commission to take prompt action to ensure that customers receive the information necessary to allow them to continue to use their carrier of choice following the CIC transition.

### ARGUMENT

Although the Commission has stated that carriers are primarily responsible for customer education about dialing pattern changes,<sup>6</sup> the Commission clearly remains concerned about this educational effort. Accordingly, the Commission concluded that even in the early stages of this transition process, the LECs “at a minimum” must use a standard intercept message.<sup>7</sup> In order to ensure the continuation of vigorous long distance price competition and consumer carrier choice that dial-around calling produces, consumers must have clear and specific information about how to place such calls after the CIC transition. Because many dial-around providers do not have direct contact with significant numbers of their customers,<sup>8</sup> a standard intercept message is the key means by which redialing information can be delivered.

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with certain LECs regarding the ability to include bill inserts describing the new dialing pattern. Because the Commission is not seeking comment on these issues at this time, QCC will reserve its comments for a separate proceeding.

<sup>5</sup> Ex Parte Letter from Sallet to Metzger of March 17, 1998 (“*MCI Letter*”); Ex Parte Letter from Troup to Matisse of March 23, 1998) (“*VarTec Letter*”).

<sup>6</sup> *CIC Reconsideration Order* at 17892.

<sup>7</sup> *Id.*

<sup>8</sup> Many dial-around customers are occasional, or casual, callers with whom dial-around providers have little or no direct relationship. About 33% of QCC’s customer base, or 110,000 customers, fall within this category. Combined with the obstacles experienced by carriers in getting explanatory bill inserts, see footnote 4, ineffective intercept

The standard intercept message adopted by the industry reads as follows:

Your call cannot be completed as dialed. If you dialed a 5 digit code, it has changed. Please redial adding a one and a zero before the 5 digit code, or for assistance contact the carrier you are trying to use.

Although it is critical that *all* LECs provide this specific redialing information, VarTec has indicated that at least three LECs may not use this intercept message.<sup>9</sup> The Commission must order all LECs to use a standard intercept message that provides this detail. It is unacceptable for any LEC to provide an alternative message that simply states that the call cannot be completed and that customers should contact their carrier for further information.<sup>10</sup> The amount of time required for customers to look up their carrier's telephone number, place the call, find the correct person to provide the redialing information, record this information, and then hang up and redial the call will encourage many customers to terminate the call and resort to the presubscribed carrier for the line, even if they would prefer not to use that carrier. No LEC should be allowed to frustrate customer choice in this manner when simply providing a slightly revised industry-developed standard message largely resolves the problem.

Regarding the specific content of the standard intercept message, QCC agrees with MCI that the first sentence is superfluous -- if a customer receives a recording that provides redialing information, it will be apparent that the call could not be completed as

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messages make it difficult or impossible adequately to advise customers about the new dialing patterns.

<sup>9</sup> *VarTec Letter* at 3-4.

<sup>10</sup> The VarTec Letter and its exhibits indicate that this is precisely the type of message that Sprint Local intends to use, that GTE simply "has determined [its] own announcement," and that SNET may provide no intercept message at all in some of its switches. *VarTec Letter* at 3-4 (and exhibits thereto).

dialed.<sup>11</sup> Even worse, however, this first sentence might cause many callers to hang up before hearing the redialing details. As a result, many customers may become sufficiently frustrated that they either do not place the call at all, or they simply use the presubscribed carrier for that line due solely to the fact that they did not hear the redialing information. The Commission should instruct the industry to remove this first sentence to minimize the risk of customer frustration and confusion.

In a similar fashion, as both MCI and VarTec argue,<sup>12</sup> the possible LEC use of SITs preceding the intercept message also may induce some customers to simply hang up without hearing the redialing instructions. As with the first sentence of the standard message, the tones are superfluous and would create, rather than minimize, confusion. Accordingly, the Commission should also instruct LECs not to use SITs in connection with the intercept message.

### **CONCLUSION**

The Commission must act promptly to ensure that some LECs do not frustrate the delivery of simple redialing information to customers. Accordingly, the Commission should order all LECs to provide an agreed-upon standard intercept message with specific redialing instructions, to eliminate the unnecessary first sentence that could dissuade callers from hearing the redialing instructions, and eliminate the use of SITs that could similarly dissuade callers from reaching the desired instructions. These simple actions

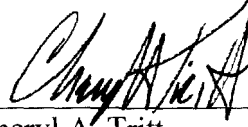
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<sup>11</sup> *MCI Letter* at 3-4.

<sup>12</sup> *MCI Letter* at 4; and *VarTec Letter* at 5.

would help to provide helpful customer information that will permit the continued choice of carriers and robust price competition that dial-around calling has created.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cheryl A. Tritt", written over a horizontal line.

Cheryl A. Tritt

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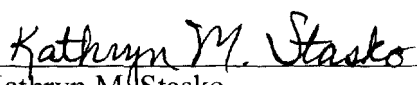
Dated: April 10, 1998

## CERTIFICATE OF SERVICE

I, Kathryn M. Stasko, do hereby certify that the foregoing **COMMENTS OF QWEST COMMUNICATIONS CORPORATION** was delivered, via first class mail, postage prepaid, on this 10<sup>th</sup> day of April, 1998, to the following:

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\* By Hand

  
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